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Clark County School District,
Filberto Arroyo, James Ketsaa and
Christopher Klemp

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

DANIEL M. BURGESS, individually,

Plaintiff,

vs.

Court Case No. 2:15-cv-01828-JCM-NJK

CLARK COUNTY SCHOOL DISTRICT, a
political subdivision; FILBERTO ARROYO,
an individual; JAMES KETSAA, an
individual; CHRISTOPHER KLEMP, an
individual; DOES I through X; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND THE DEADLINE
TO FILE AND SERVE AN ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between all parties hereto, through their respective counsel of record, to extend the deadline until November 27, 2015 for Defendants Clark County School District (“CCSD”), Filiberto Arroyo, James Ketsaa and Christopher Klemp (collectively, “Defendants”), to file and serve an answer or otherwise respond to Plaintiff Daniel M. Burgess’ Complaint.

This extension is requested to consolidate the time for all Defendants to respond to the allegations in the complaint as each Defendant was served on a different date. The proposed

November 27, 2015 response date is 60 days from the date in which counsel accepted service pursuant to F.R.C.P. 4(d) for James Ketsaa, the last defendant to be served in this matter.

The respective service dates for Defendants are as follows:

- a. The Complaint was served on CCSD on August 24, 2015;
- b. The Complaint was served on Filberto Arroyo on August 26, 2015;
- c. The Complaint was served on Christopher Klemp on September 22, 2015; and
- d. Counsel for Defendants waived service of Defendant James Ketsaa on September 28, 2015 pursuant to F.R.C.P. 4(d).

This is the first request for an extension of the response deadline.

Accordingly, the parties respectfully request the Court to order such deadline to answer or otherwise respond to Plaintiff's Complaint be extended to November 27, 2015.

Dated: September 29, 2015.

Dated: September 29, 2015.

GREENBERG TRAURIG, LLP

MAIER GUTIERREZ AYON

/s/ Kara B. Hendricks

/s/ Jason R. Maier

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Attorneys for Plaintiff

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ORDER

Pursuant to the stipulation of the parties,

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that the stipulation and order to extend the deadline until November 27, 2015, for Defendants to answer or other respond to Plaintiff's Complaint, is hereby **GRANTED**.



United States Magistrate Judge

~~DATE/TIME:~~ September 30, 2015

Respectfully submitted by:

GREENBERG TRAURIG, LLP

/s/ Kara B. Hendricks

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